

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON

UNITED STATES OF AMERICA,

v.

Case No. 2:13-cr-225-1

JAMES GREGORY GLICK,

Defendant.

**SUMMARY OF PROSPECTIVE EVIDENCE OFFERED ON
BEHALF OF JAMES GREGORY GLICK**

In support of Mr. Glick's Motion that he be released pending trial, under the provisions of 18 U.S.C. §3142, Mr. Glick, by his counsel submits the following:

1. **Witnesses:** The Defendant has under subpoena and others by voluntary appearance **at least nine witnesses**. Each of these witnesses has known Mr. Glick at least six years and as many as thirty years. These witnesses are familiar with Mr. Glick in his capacity as business owner, as extensively involved in youth sports activities, as donor to charitable causes, most of which was without any particular recognition, as personal friend and as a member of the Glick family. They know him as the father of two children, as coach in baseball, football and basketball leagues, and as a customer in the food-service industry. They know him as boss, and business proprietor.

2. **Family.** Also attending this hearing are Mr. Glick's mother, Mindy Glick of Logan, and Myrtle Beach, his brother, Michael, and his sister Deedee, both of North Carolina. Mrs. Glick is prepared to offer her home in Logan as collateral for her son's release. She will

with her a justification of surety. The home carries a **tax value of \$122,000**, therefore it is submitted that the value is likely twice that amount and it is unencumbered. Also in attendance is Mrs. Greg Glick (Angel). They are the parents of two children ages 13 and 9.

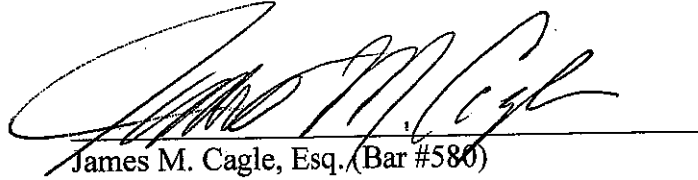
3. **Employment.** Mr. Glick is the owner of a business in the City of Logan. He operates a restaurant known as 317 - The Steak House. He currently employs 11 who work as managers, waitresses, cooks, and dishwasher. The business has a dining area, a bar area, lottery machines and private banquet room. It caters, hosts wedding rehearsals, seasonal parties, and other entertainment gatherings.

4. **Factors.** Counsel is mindful of the factors to be considered and expects to offer evidence which addresses each as identified under Section 3142(g).

5. **Conditions of Release.** The undersigned anticipates offering conditions which will assure both attendance and safety of other persons and community inclusive of the following:

- a. A property bond, if required, in the form of real estate of considerable value and import to the Glick family, ie, Mrs. Glick's home;
- b. Surrender of Mr. Glick's passport;
- c. Restrictions to secure that no contact is made by Mr. Glick of any prospective witness or juror;
- d. Periodic contact with probation department
- e. Travel restriction;
- f. Regular attendance to the business, volunteer activities and communication with counsel;

RESPECTFULLY SUBMITTED,

A handwritten signature in black ink, appearing to read "James M. Cagle", is written over a horizontal line.

James M. Cagle, Esq. (Bar #580)

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CERTIFICATE OF SERVICE

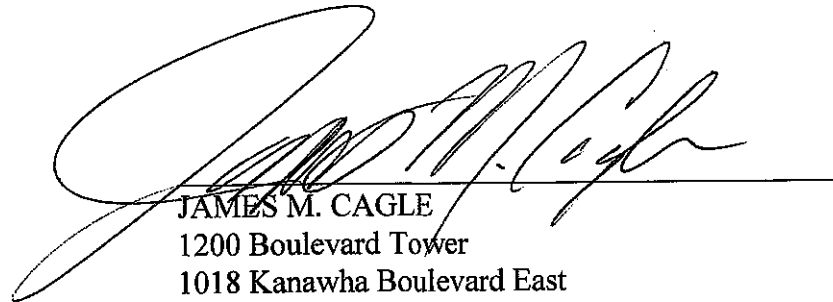
It is hereby certified that service of the foregoing "SUMMARY OF PROSPECTIVE EVIDENCE OFFERED ON BEHALF OF JAMES GREGORY GLICK" has been electronically filed and service has been made on opposing counsel via hand delivery, on this the 6th day of September 2013, to:

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